

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

---

<b>JOSE FLORES,</b>	)	
on behalf of himself and all others	)	
similarly situated	)	
	)	
Plaintiff,	)	<b>C.A. No. 14-3298</b>
vs.	)	
	)	<b>CLASS ACTION</b>
<b>EXPRESS SERVICES, INC., and</b>	)	
<b>EXPRESS PERSONNEL - PHILADELPHIA</b>	)	
	)	
Defendants	)	
	)	

---

**PLAINTIFF'S UNCONTESTED MOTION FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT AND NOTICE TO CLASS**

Pursuant to Fed. R. Civ. P. 23(c) and Eastern District Local Rule 23.1, and for the reasons set forth more fully in the attached Memorandum of Law, Plaintiff Jose Flores moves the Court for an Order preliminarily approving the settlement of this class action, approving the form and method for providing class-wide notice and scheduling a hearing at which the following will be considered: request for final approval of the proposed settlement, entry of the Final Judgment and Order and Plaintiff's request for approval of agreed-upon attorney's fees and costs.

Defendants do not contest the requested relief.

Dated: October 21, 2016

Respectfully submitted,

By: **FRANCIS & MAILMAN, P.C.**  
s/ David A. Searles  
James A. Francis  
John Soumilas  
David A. Searles  
Lauren KW Brennan  
Land Title Building, Suite 1902  
100 South Broad Street  
Philadelphia, PA 19110  
(215) 735-8600

*Attorneys for Plaintiff and the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed electronically and served by U.S. Mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by facsimile to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's EM/ECF System.

Dated: October 21, 2016

By: /s/ David A. Searles  
David A. Searles